UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

COURTNEY CATES, BRIAN STOVER,)	
JASON MILLER, on behalf of themselves)	
and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:16-cv-00008
)	
CRYSTAL CLEAR TECHNOLOGIES, LLC,)	Judge Aleta A. Trauger
CARBINE & ASSOCIATES LLC; HOOD)	
DEVELOPMENT, LLC; TOLLGATE)	ORAL ARGUMENT
VILLAGE ASSOCIATION INC.;)	REQUESTED
CANTERBURY HOMEOWNERS)	
ASSOCIATION INC.; and DIRECTV, LLC,)	
)	
Defendants.)	

DEFENDANT DIRECTV, LLC'S MOTION TO COMPEL ARBITRATION AND STAY LITIGATION

Pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 1-16, defendant DIRECTV, LLC ("DIRECTV") respectfully moves this Court to enter an order (i) compelling plaintiffs Courtney Cates, Brian Stover, and Jason Miller to arbitrate their claims against DIRECTV on an individual basis and (ii) staying further proceedings regarding those claims pending the outcome of the arbitrations.

In support of this Motion, DIRECTV incorporates by reference the attached Memorandum, the Declarations of Katherine Bradley and Clark Milner along with their supporting exhibits, any reply brief and supporting documents that DIRECTV may file, and any oral argument the Court may allow at a hearing on this Motion.

Dated: March 14, 2016

Respectfully submitted,

/s/ R. Dale Grimes_

Robert Dale Grimes (#6223) Virginia M. Yetter (#31471) BASS, BERRY & SIMS PLC 150 Third Avenue South, Suite 2800 Nashville, TN 37201 (615) 742-6200 dgrimes@bassberry.com

Mark W. Ryan (pro hac vice) Archis A. Parasharami (pro hac vice) MAYER BROWN LLP 1999 K Street, N.W. Washington, D.C. 20006 (202) 263-3338 mryan@mayerbrown.com aparasharami@mayerbrown.com

Attorneys for Defendant DIRECTV, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March 2016, a true and exact copy of the foregoing has been served on the following via the Court's electronic filing system:

Counsel for Plaintiffs	Counsel for Crystal Clear Technologies LLC
	and Carbine & Associates, LLC
Benjamin A. Gastel (#28699)	
J. Gerard Stranch, IV (#23045)	Craig V. Gabbert, Jr.
Branstetter, Stranch & Jennings, PLCC	D. Alexander Fardon
227 Second Avenue North, Fourth Floor	Harwell Howard Hyne Gabbert & Manner, P.C.
Nashville, TN 37201-1631	333 Commerce Street, Suite 1500
Tel.: 615-254-8801	Nashville, TN 37201
gerards@BSJFirm.com	Tel.: 615-256-0500
beng@BSJFirm.com	cvg@h3gm.com
	daf@h3gm.com
Counsel for Canterbury Homeowners	Counsel for Canterbury Homeowners
Association, Inc.	Association, Inc.
Association, me.	Association, me.
Tricia T. Olson	Cannon F. Allen, Sr.
Rocklan W. King III	Adams and Reese LLP
Adams and Reese LLP	6075 Poplar Avenue, Suite 700
424 Church Street, Suite 2700	Memphis, TN 38119
Nashville, TN 37219	Tel.: 901-525-3234
Tel.: 615-259-1450	cannon.allen@arlaw.com
tricia.olson@arlaw.com	
rocky.king@arlaw.com	
Counsel for Hood Development, LLC	Counsel for Defendants Bridgemore Village
	and Tollgate Village Associations
Christopher E. Thorsen	
Bradley Arant Boult Cummings LLP	H. Rowan Leathers, III
1600 Division St., Suite 700	Valerie D. Moore
Nashville, TN 37203	Butler Snow LLP
Tel.: 615-244-2582	Suite 1600 Pinnacle Bldg
cthorsen@babc.com	150 Third Avenue South
	Nashville, TN 37201
	Tel.: 615-651-6700
	rowan.leathers@butlersnow.com

/s/ R. Dale Grimes

R. Dale Grimes